

# EXHIBIT H

**From:** Marlene Goldenberg  
**Sent:** Friday, October 2, 2020 10:57 AM  
**To:** Goldberg, Seth A. ; [lockardv@gtlaw.com](mailto:lockardv@gtlaw.com); Ferretti, Joseph S. ; [jheinz@c-wlaw.com](mailto:jheinz@c-wlaw.com); [cct@pietragallo.com](mailto:cct@pietragallo.com); [jmr@pietragallo.com](mailto:jmr@pietragallo.com); [eabraham@hillwallack.com](mailto:eabraham@hillwallack.com); [gwright@hillwallack.com](mailto:gwright@hillwallack.com); [CohenL@gtlaw.com](mailto:CohenL@gtlaw.com); [lefkowitz@kirkland.com](mailto:lefkowitz@kirkland.com)  
**Cc:** [valpec@kirtlandpackard.com](mailto:valpec@kirtlandpackard.com)  
**Subject:** Re: List of Third Party Subpoenas

Seth and Victoria,

Will Defendants first inform Plaintiffs for which entities they will agree to accept service or process?

Additionally, if any defendant believes that a third party did not perform any work or does not possess any documents relating to the issues in this MDL, please let us know.

Thanks,

Marlene

**Marlene J. Goldenberg • Partner**

**GoldenbergLaw, PLLC**

800 LaSalle Avenue, Suite 2150, Minneapolis, MN 55402

Direct: (612) 436-5028 • Toll-Free: (855) 333-4662 • Fax: (612) 367-8107

[email](#) • [website](#) • [bio](#)

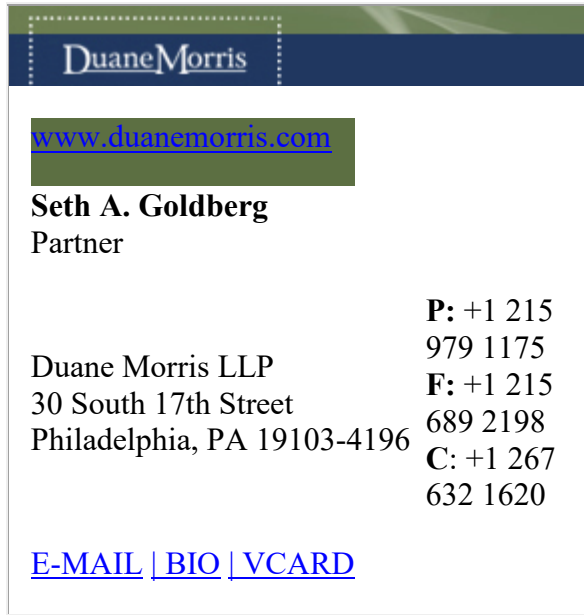
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**From:** Goldberg, Seth A. <[SAGoldberg@duanemorris.com](mailto:SAGoldberg@duanemorris.com)>  
**Sent:** Friday, October 2, 2020 9:37 AM  
**To:** [lockardv@gtlaw.com](mailto:lockardv@gtlaw.com); Marlene Goldenberg; Ferretti, Joseph S.; [jheinz@c-wlaw.com](mailto:jheinz@c-wlaw.com); [cct@pietragallo.com](mailto:cct@pietragallo.com); [jmr@pietragallo.com](mailto:jmr@pietragallo.com); [eabraham@hillwallack.com](mailto:eabraham@hillwallack.com); [gwright@hillwallack.com](mailto:gwright@hillwallack.com); [CohenL@gtlaw.com](mailto:CohenL@gtlaw.com); [lefkowitz@kirkland.com](mailto:lefkowitz@kirkland.com)  
**Cc:** [valpec@kirtlandpackard.com](mailto:valpec@kirtlandpackard.com)  
**Subject:** RE: List of Third Party Subpoenas

Marlene,

Counsel for ZHP and Solco also would like to have a call, and it would be helpful to see the draft subpoenas or the list of information you are seeking from the third parties in advance of the call.

Seth



**From:** [lockardv@gtlaw.com](mailto:lockardv@gtlaw.com) <[lockardv@gtlaw.com](mailto:lockardv@gtlaw.com)>  
**Sent:** Thursday, October 1, 2020 9:22 AM  
**To:** [mjgoldenberglaw.com](mailto:mjgoldenberglaw.com); Goldberg, Seth A. <[SAGoldberg@duanemorris.com](mailto:SAGoldberg@duanemorris.com)>;  
Ferretti, Joseph S. <[JSFerretti@duanemorris.com](mailto:JSFerretti@duanemorris.com)>; [jheinz@c-wlaw.com](mailto:jheinz@c-wlaw.com); [cct@pietragallo.com](mailto:cct@pietragallo.com);  
[jmr@pietragallo.com](mailto:jmr@pietragallo.com); [eabraham@hillwallack.com](mailto:eabraham@hillwallack.com); [gwright@hillwallack.com](mailto:gwright@hillwallack.com);  
[CohenL@gtlaw.com](mailto:CohenL@gtlaw.com); [lefkowitz@kirkland.com](mailto:lefkowitz@kirkland.com)  
**Cc:** [valpec@kirtlandpackard.com](mailto:valpec@kirtlandpackard.com)  
**Subject:** RE: List of Third Party Subpoenas

Thanks Marlene, yes on behalf of Teva it would be helpful to set a call on this. Can you also send us the draft subpoenas ideally or at least a list of what information is being subpoenaed?

**Victoria Davis Lockard**  
Shareholder

Vice-Chair, Pharmaceutical, Medical Device & Health Care Litigation

Products Liability & Mass Torts

Greenberg Traurig, LLP | 3333 Piedmont Road NE | Suite 2500 | Atlanta, GA 30305  
Tel 678.553.2103 | Fax 678-553-2104

[lockardv@gtlaw.com](mailto:lockardv@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com)



**From:** Marlene Goldenberg [<mailto:mjgoldenberg@goldenberglaw.com>]  
**Sent:** Wednesday, September 30, 2020 11:39 PM  
**To:** [sagoldberg@duanemorris.com](mailto:sagoldberg@duanemorris.com); [jsferretti@duanemorris.com](mailto:jsferretti@duanemorris.com); [jheinz@c-wlaw.com](mailto:jheinz@c-wlaw.com); [cct@pietragallo.com](mailto:cct@pietragallo.com); [jmr@pietragallo.com](mailto:jmr@pietragallo.com); [eabraham@hillwallack.com](mailto:eabraham@hillwallack.com); [gwright@hillwallack.com](mailto:gwright@hillwallack.com); Cohen, Lori (Shld-Atl-LT) <[CohenL@gtlaw.com](mailto:CohenL@gtlaw.com)>; Lockard, Victoria D. (Shld-Atl-LT) <[lockardv@gtlaw.com](mailto:lockardv@gtlaw.com)>; [lefkowitz@kirkland.com](mailto:lefkowitz@kirkland.com)  
**Cc:** Valsartan PEC Listserv <[valpec@kirtlandpackard.com](mailto:valpec@kirtlandpackard.com)>  
**Subject:** List of Third Party Subpoenas

**\*EXTERNAL TO GT\***

Counsel,

Attached please find the list of parties Plaintiffs intend to serve with third party subpoenas. If you would like to discuss any of these entities with us in advance of the subpoenas being served, please let us know immediately so we can begin the meet and confer process. Please note that this list is based upon the documents and information that we have now and may expand or contract as additional documents are produced and as we learn more.

Thank you,

Marlene

**Marlene J. Goldenberg • Partner**

**GoldenbergLaw, PLLC**

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Direct: (612) 436-5028 • Toll-Free: (855) 333-4662 • Fax: (612) 367-8107

[email](#) • [website](#) • [bio](#)